

**DJF:SSD**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

<b>GRAZYNA S. GREZAK,</b>	:	<b>No. 3:15-CV-2111</b>
<b>Plaintiff</b>	:	
	:	<b>(Judge Mannion)</b>
<b>v.</b>	:	<b>(Magistrate Judge Mehalchick)</b>
	:	
<b>ROPES &amp; GRAY, LLP, et al.,</b>	:	
<b>Defendants</b>	:	<b>(Electronically Filed)</b>

**BRIEF IN OPPOSITION TO PLAINTIFF'S  
SECOND MOTION FOR SANCTIONS**

Federal Courtroom Deputy Clerk Aisha Bams opposes the second motion for sanctions filed by *pro se* Plaintiff Grazyna S. Grezak. See Docs. 156, 167 (second sanctions motion); see also Docs. 129, 153, 162 and 172 (first sanctions motion). As with her prior submissions, Grezak's newest motion is both outlandish and unfounded, and continues to rehash the same issues already fully briefed in Bams' motion to dismiss, which is currently pending. Id.; see also Docs. 70, 73, 103 (dismissal is warranted because Grezak's claim is barred by sovereign immunity and because Grezak fails to state a claim against Bams).

Grezak's third amended complaint asserts that S.D.N.Y. Federal Courtroom Deputy Clerk Aisha Bams committed conspiracy in violation of 42 U.S.C. § 1985 when the Deputy Clerk called Grezak and left a voicemail asking her to attend a Rule 16 pre-trial conference scheduled by the Court in Grezak's own lawsuit. Doc.

27 at ¶¶ 17, 22, 76-84; see also Sklodowska-Grezak v. Stein, No. 15-CV-1670-JGK-DCF (S.D.N.Y.), at docket entries on 7/29/16 and 8/30/16, Exhibit A to Bams' Motion to Dismiss. **Grezak believes Deputy Clerk's telephone call constituted an attempted kidnapping and unlawful search and seizure.** Id.; see also Doc. 82 at 3-5. More recently, Grezak charged that Deputy Clerk "Bams was hired as a 'hit man' on Plaintiff by [the other defendants], and attempted to kidnap Plaintiff." Doc. 153 at 4.

As set forth in Bams' Motion to Dismiss, this Court should dismiss Grezak's third amended complaint against Bams with prejudice because Grezak's Section 1985 claim is barred by sovereign immunity, and because Grezak fails to state a claim. See Docs. 70, 73, 103. Grezak now asks this Court to sanction Bams and her counsel for filing a motion to dismiss. See Doc. 167 at 6. Bams stands on the legal arguments raised in her Motion to Dismiss and supporting briefs. See Docs. 70, 73, 103. Grezak's claim that Bams should be sanctioned for filing a motion to dismiss is nonsensical, especially because it remains clear that Grezak has not (and cannot) state a valid claim against Bams. Id.

Grezak further contends that sanctions are warranted because the undersigned purportedly "hacked to Plaintiff's personal emails and did take over her PDF documents on Feb. 16 and Feb. 20 of 2018," and because the undersigned attempted

to dissuade Grezak from filing a redundant sur-reply brief. Doc. 167 at 3. As with her other accusations, Grezak fails to support her new (and hostile) accusations.

No basis exists to entertain Grezak's inflammatory filings, which repeatedly make the same unsubstantiated charges without providing any evidence. Grezak's misguided and unsupported filings should be rejected out of hand, and this case dismissed with prejudice for the reasons set forth in Bams' Motion to Dismiss. See Docs. 70, 73, 103.

Respectfully submitted,

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Date: May 10, 2018

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	:	<b>(Judge Mannion)</b>
<b>v.</b>	:	<b>(Magistrate Judge Mehalchick)</b>
	:	
<b>ROPES &amp; GRAY, LLP, et al.,</b>	:	
<b>Defendants</b>	:	<b>(Electronically Filed)</b>

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that he is an employee in the Office of the United States Attorney for the Middle District of Pennsylvania and is a person of such age and discretion as to be competent to serve papers. The undersigned further certifies that on this 10th day of May 2018, he served a copy of the foregoing

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to the parties as follows:

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